



**U.S. Department of State  
Bureau of Educational and Cultural Affairs  
Private Sector Exchange**

**September 14, 2017**

## **Guidance Directive 2017-02**

### **Secondary School Student Program: Host Family Placement and Monthly Contact Reports as a Key Health, Safety, and Welfare Tool**

The Department implemented the *Host Family Placement Evaluation Project* to determine why a significant number of secondary school exchange students appear to change host families early in the academic year. The Department found that, in a significant number of cases, sponsors' monthly contacts did not provide the detail needed to establish the circumstances of exchange students' host family changes. Documentation of monthly contacts should provide complete, accurate, and timely information, and such documentation should capture the kinds of information that demonstrate to the Department that sponsors have conducted the required monthly monitoring, including documenting the movement of exchange students into and out of host family homes. Documentation of student monthly contact allows sponsors to demonstrate to the Department their compliance with the program rules. Relatedly, the EVP regulations prohibit sponsors from bringing to the United States exchange students for whom they have not found host family homes beforehand.

The regulations at 22 **C.F.R. § 62.25(l)(1)(i)** require all secondary school student sponsors to secure host family homes for exchange students prior to exchange students' arrival in the United States. Secondary school student sponsors should be aware that the Department implemented the regulations at 22 **C.F.R. § 62.25(l)(1)(i)**, among others, to safeguard the health, safety, and welfare of a vulnerable population. The program regulations prohibit secondary school student sponsors from facilitating the entry of exchange students into the United States without first securing a host family home for exchange students. Sponsors should reflect these placements in the final academic year and semester program participant reports due by August 31 and January 15. Once exchange students have arrived in the United States, it is critical that sponsors monitor their adjustment to a new culture and family environment.

Secondary school student sponsors should also be aware of the program regulations at **22 C.F.R. § 62.25(d)(11)**, which require secondary school student sponsors to maintain, at minimum, a monthly schedule of documented personal contact with exchange students, and to ensure that any issues raised in monthly contacts are promptly and appropriately addressed. The Department reminds sponsors that the regulation that guides the implementation of the aforementioned reporting and placement requirements, **22 C.F.R. § 62.9(d)(1)**, instructs all exchange visitor program sponsors to submit complete, accurate, and timely information to the Department regarding their programs.

In addition to host family screening and vetting, monthly contacts allow sponsors to monitor the exchange students in their programs and to document their compliance with regulatory requirements. The obstacle that the Department encountered in confirming exchange students' host family placements during its *Host Family Placement Evaluation Project* was a lack of clear and supporting information in sponsors' documentation of monthly contacts. To ensure that sponsors promptly and appropriately address exchange students' needs and concerns, the Department expects all documentation of monthly contacts to provide timely and accurate information about exchange students' programs, and to demonstrate that sponsors record significant changes in exchange students' circumstances.

The Department delivered information requests to sponsors on September 1, 2015, to establish that the exchange students, whose files it sampled in the course of its *Host Family Placement Evaluation Project*, had resided in the host family homes sponsors had reported on their biannual placement reports, or for their files to explain the reasons why sponsors subsequently moved exchange students early in their programs. The Department confirmed in 86 percent of the files it reviewed that exchange students had resided with the host families listed on sponsors' bi-annual placement reports,<sup>1</sup> and that sponsors had properly documented exchange students' moves from one home to another. For the remaining 14 percent of the files it reviewed, the Department could not confirm if exchange students had resided in the homes sponsors reported on their biannual placement reports, or what had precipitated such abrupt host family changes.

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<sup>1</sup> 22 C.F.R. § 62.25(n)(2) states that SSS category sponsors must file with the Department: "[a] report of all final academic year and semester program participant placements by August 31 for the upcoming academic year or January 15 for the Spring semester and calendar year. The report must be in the format directed by the Department and must include at a minimum, the exchange student's full name, Form DS-2019 number (SEVIS ID #), host family placement (current U.S. address), school (site of activity) address, the local coordinator's name and zip code, and other information the Department may request".

A move from one host family to another constitutes the kind of significant change that sponsors should document following monthly contact with exchange students. The Department urges secondary school student sponsors to ensure that documentation of monthly contacts demonstrates that they have accurately reported on exchange students' placements. The Department asks secondary school student sponsors to consider the documentation of their monthly contacts with the reporting and placement regulations discussed in this Directive in mind. Accordingly, the Department provides below a report on the best practices it found in a review of documentation of exchange students' monthly contacts during the course of its *Host Family Placement Evaluation Project*.

### **Best practices in the design of monthly contact reports**

The Department found in the course of its *Host Family Placement Evaluation Project* that 86 percent of the documented exchange student monthly contacts it reviewed, approximately 430 forms, were sufficient to inform the Department that the sponsor had complied with the regulatory requirements described in this Directive. The Department discovered however, that 14 percent of the documented monthly contacts it reviewed, approximately 70 forms, did not confirm exchange students' host family placements or a move, if one occurred. The best documentation of student monthly contacts were reports that told a continuous story of exchange students' program experiences. These reports of monthly contacts provided detailed information about the significant changes in exchange students' programs, and the reports discussed the issues that had occurred during exchange students' programs.

The Department found that the best monthly contact reports contained at a minimum, exchange students' names, the contact date, and the type of contact, such as whether the sponsor met face to face with the exchange student or on the telephone, host families' names, and the names of sponsors' local and regional coordinators. The reports informed the Department that exchange students lived with the families listed on sponsors' biannual placement reports, and the reports included a full explanation, where applicable, of why exchange students moved and the circumstances that precipitated the change. Such monthly contact reports provided space for individual responses, offered narratives about exchange students' program experiences, and did not rely on yes or no answers. The reports referenced activities in which exchange students had engaged, such as their positions on sports teams or exchange students' membership in clubs and participation in afterschool events.

Conversely, less detailed documentation of exchange students' monthly contacts did not provide the types of information necessary to demonstrate that sponsors sufficiently monitored their exchange students. In some instances, such documentation did not provide the first and last names of the subsequent and former host families to and from which exchange students had moved, or demonstrate to the Department that a substantive monthly contact had even taken place. Such documentation of monthly contacts often relied on closed questions and rating scales, and was comprised of generic comments that could apply to any number of exchange students' programs. Such documentation often lacked direct references to significant events in exchange students' programs, including the move from one host family home to another; some did not indicate to the Department that exchange students had moved at any time, although the host family name and address listed in SEVIS differed from sponsors' biannual placement reports. Such documentation offered neither an explanation as to why and when, and under what circumstances, exchange students moved, nor an account as to why sponsors did not place exchange students at the homes they reported to the Department on their biannual placement report.

The Department encountered a small number of documented monthly contacts that raised concerns regarding exchange student monthly monitoring. Some documentation appeared photocopied several times over, making it difficult or impossible to read. Some had had monitoring dates whited out and written over again. The Department also found documentation that referenced events in months in which they could not have occurred, such as a report of an exchange student's excitement to participate in the Thanksgiving holiday for the first time in the month of November, but then again in the months of December and January.

In closing, the Department reminds sponsors that documentation of monthly contacts serves as a key health, safety, and welfare tool and should provide complete, accurate, and timely information that demonstrates to the Department that sponsors have conducted the required monthly monitoring. The Department also reminds sponsors that the regulations prohibit them from bringing to the United States exchange students for whom they have not found host family homes beforehand. Documentation of student monthly contact allows sponsors to demonstrate to the Department their compliance with the program rules. The Department suggests that sponsors review and update their exchange student monthly monitoring forms, if appropriate, based on this Directive.

Should you have any questions, please contact the Office of Private Sector Exchange Designation for further guidance.

Email address:

Secondary School Student Category – [DesignationSSSP@state.gov](mailto:DesignationSSSP@state.gov)

A handwritten signature in blue ink, appearing to read 'KS', enclosed within a circular scribble.

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for Private Sector Exchange